

FACT SHEET - AMENDMENT #2

City of Quincy Industrial Wastewater Treatment Facility PERMIT WA-002106-7

I. GENERAL INFORMATION

Applicant	City of Quincy
Facility Name and Address	Industrial Wastewater Treatment Facility P.O. Box 338 Quincy, WA 98848
Type of Treatment:	Municipally owned vegetable and potato processing wastewater treatment facility using conventional primary and biological secondary treatment.
Discharge Location	Waterbody Name: Bureau of Reclamation irrigation wasteway DW237. Latitude: 47° 12' 04" N Longitude: 119° 53' 17" W.
Water Body ID Number	WA-41-1120 (Potholes Reservoir)

II. BACKGROUND

The City of Quincy, WA (Grant Co.) owns an industrial wastewater treatment facility that receives and treats wastewater year around from a potato and vegetable processor, and discharges to an irrigation wasteway that is part of the federal Columbia Basin Irrigation Project. This treatment facility was designed to treat vegetable-type process wastewater and is separate from the sanitary sewer system of the city. Quincy entered into a 20-year agreement with Earth Tech, Inc., effective October 1, 2000, for the over all operation and maintenance of the industrial treatment facility.

An NPDES permit (No. WA-0021067) was re-issued to the city for the industrial treatment facility on May 2, 2001 and expires on May 31, 2006. The discharge limits for BOD, ammonia-N, and fecal coliforms are based on an EPA approved TMDL; TSS limits are performance-based; dissolved oxygen limits are based on the modeling used to determine the BOD maximum daily load; and, the temperature limit was based on meeting the state's surface water temperature criteria.

An upgrade to the treatment facility started in 2001 that included the conversion of the treatment facility from an oxidation pond system to a sequencing batch reactor (SBR). The upgraded facility went online in February 2002.

The City completed a Use Attainability Analysis (UAA) report in September 1999 to support the City's request to Ecology to reclassify the designation of the wasteway from Class AA to a level that reflects its use. This change would result in identifying actual uses in the water body and would impose water quality criteria that supports those uses.

The permit was modified on December 16, 2003 to remove enterococcus testing of the effluent. This testing was originally placed in the permit because Ecology was

considering adding this as a bacterial indicator to the state's surface water standards; it was later dropped by the agency.

On January 13, 2004, Waste Action Project (Appellant) filed a notice of appeal with the Pollution Control Hearings Board (PCHB) (PCHB No. 04-003) of the permit modification.

The appeal issues identified in the PCHB's Pre-Hearing Order are as follows:

1. Whether an NPDES permit modification removing a duplicative testing requirement reopens the entire permit and allows an appeal of other conditions imposed at the time the permit was issued, for which the appeal period passed two and one-half years ago?
2. Whether the Board has jurisdiction to consider whether Earth Tech must be a permittee or co-permittee, and if the Board does have jurisdiction, whether Earth Tech must legally be identified as a permittee or co-permittee?
3. Whether the Board has jurisdiction to consider permit provisions concerning fecal coliform, dissolved oxygen and temperature limits and compliance schedules, and if so, whether the permit provisions concerning fecal coliform, dissolved oxygen and temperature effluent limits and compliance schedules are lawful?
4. Whether the Board has jurisdiction to consider if the Permit requires implementation of AKART for dissolved oxygen, fecal coliform, ammonia nitrogen, and temperature, and if so, whether the permit fails to require implementation of AKART for dissolved oxygen, fecal coliform, ammonia nitrogen and temperature?
5. Whether the Board has jurisdiction to consider the TSS technology-based effluent limits in the permit and, if so, whether the permit fails to require compliance with technology-based effluent limits for TSS? Is the December 16, 2003, modification of the challenged permit unlawful or unjust?

III. APPEAL SETTLEMENT

Ecology has agreed to modify the NPDES permit to enable Ecology to better monitor permit compliance and to settle the permit appeal:

- A. Enterococcus testing will be removed from the permit.
- B. Earth Tech, Inc. will be added to the permit as a co-permittee. The city would be identified as the owner and Earth Tech, Inc. as the operator. This would comply with NPDES requirements [40 CFR, Part 122.21(b)], and be consistent with the city's municipal state waste discharge permit that lists the city as the owner and Earth Tech as the operator. Adding Earth Tech as a co-permittee would also allow Ecology to interact directly with Earth Tech to resolve permit compliance issues, since the 20 year service agreement gives Earth Tech, "...full management and control of the Facilities.." (Service Agreement Section 6.1).

In addition, the following language will be taken from the permit Fact Sheet for the city's municipal state waste discharge permit (No. ST5278) and added to this Fact Sheet amendment. Some changes will be made to apply to the industrial facility. This language more clearly explains the Design/Build/Finance/and Operate (DBFO) service agreement between the city and Earth Tech.

"In November 1999, the City advertised for and received bids for a project to Design, Build, Finance and Operate (DBFO) its municipal and industrial wastewater treatment facilities. After months of negotiations, the City entered into a Service Agreement (Privatization Contract) with Earth Tech, Inc. in October 1, 2000 to provide the DBFO services for the municipal and industrial treatment facilities. The Service Agreement, in part, gave full management and control of the facilities to Earth Tech. Earth Tech was able to offer the City its ability to be its own general contractor ("turnkey") and to complete the design and build phase of the municipal and industrial projects. The procedure used included design and construction of each phase of the project for both facilities (i.e., Phase 1 included the below ground work, clearing, piping, rough roadways; Phase 2 included concrete work, buildings, finished roadway grading; etc.). During each Phase of construction, the design of the next phase is completed and approved for construction. When each Phase work is completed at one facility (i.e., municipal), the contractor moves to the other facility (i.e., industrial). Earth Tech's Service Agreement with the City of Quincy included construction, operation and maintenance of the upgraded industrial wastewater treatment facility for an initial period of twenty years with a negotiable extension by the end of the eighteenth year."

- C. The date for compliance with the fecal coliform limit in Section S1 of the permit (September 1, 2005) will remain unchanged, but a new section, S9. COMPLIANCE SCHEDULE will be added to the permit. This schedule will ensure compliance with the fecal limits by September 1, 2005 and be consistent with applicable federal NPDES law (40 CFR, Part 122.47).

The new Section S9 will have the following language:

- No later than December 1, 2004, the operator of the treatment facility (Earth Tech, Inc.) shall notify the Department, in writing, what form of disinfection will be installed at the industrial treatment facility that will result in the compliance with the fecal coliform limit in Section S1.
 - No later than February 1, 2005, the operator of the treatment facility (Earth Tech, Inc.) shall submit to the Department for review and approval plans and specifications for the chosen method of disinfection for the industrial effluent.
- D. The date for compliance with the temperature limit in Section S1 of the permit (September 1, 2005) will remain unchanged. To comply with the limits in this permit and to settle this appeal, language will be added to the new Section S9, COMPLIANCE SCHEDULE. This schedule will ensure compliance with the

temperature limits by September 1, 2005 and be consistent with applicable federal NPDES regulations (40 CFR, Part 122.47).

- No later than December 1, 2004, the operator of the treatment facility (Earth Tech, Inc.) shall notify the Department, in writing, how compliance with the temperature limits in Section S1 will be achieved.
 - If changes or modifications to the treatment system are required to meet the temperature limit in S.1, then no later than February 1, 2005, the operator of the treatment facility (Earth Tech, Inc.) shall submit to the Department for review and approval plans and specifications for the changes to be made to comply with the temperature limit in Section S1.
- E. The date for compliance with the dissolved oxygen limits in Section S1 of the permit (September 1, 2005) will remain unchanged. To comply with the limits in this permit and to settle this appeal, language will be added to the new Section S9, COMPLIANCE SCHEDULE. This schedule will ensure compliance with the dissolved oxygen limits by September 1, 2005 and be consistent with applicable federal NPDES regulations (40 CFR, Part 122.47).
- No later than December 1, 2004, the operator of the treatment facility (Earth Tech, Inc.) shall notify the Department, in writing, what changes or modifications to the treatment system will be implemented at the industrial treatment facility that will result in the compliance with the dissolved oxygen limits in Section S1.
 - If changes or modifications to the treatment system are necessary to meet the limits in Section S1, no later than February 1, 2005, the operator of the treatment facility (Earth Tech, Inc.) shall submit to the Department for review and approval plans and specifications for the changes to be made to comply with the dissolved oxygen limits in Section S1.

IV. CONCLUSION

The city's NPDES permit will be modified as per the previously listed changes. Ecology will follow the required 30-day public comment period for any major modification of an NPDES permit as required by applicable law; 40 CFR, Part 122.62.

Issuance Date: May 2, 2001
Effective Date: June 1, 2001
Expiration Date: May 31, 2006
Amendment Date: December 16,
2003
Amendment Date:

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
WASTE DISCHARGE PERMIT No. WA-0021067

State of Washington
DEPARTMENT OF ECOLOGY
Olympia, Washington 98504-7600

In compliance with the provisions of
The State of Washington Water Pollution Control Law
Chapter 90.48 Revised Code of Washington
And
The Federal Water Pollution Control Act
(The Clean Water Act)
Title 33 United States Code, Section 1251 et seq.

Earth Tech, Inc. (Operator)
P.O. Box 756
Quincy, WA 98848

City of Quincy (Owner)
P.O. Box 338
Quincy, WA 98848

Facility Location:
Quincy Industrial Wastewater Treatment
Facility, 201 12th Ave., S.W., Quincy, WA
98848

Receiving Water: Potholes Reservoir via
Wasteway DW237, W645W and W645

Water Body I.D. No.: WA-41-9280
(Potholes Reservoir)

Discharge Location:
Latitude: 47° 12' 04" N
Longitude: 119° 53' 17" W

Industry Type: Municipally Owned
Combined Vegetable Processing Wastewater
Treatment

is authorized to discharge in accordance with the special and general conditions which follow.

James M. Bellatty
Water Quality Section Manager
Eastern Regional Office

SUMMARY OF PERMIT REPORT SUBMITTALS

Refer to the Special and General Conditions of this permit for additional submittal requirements.

Permit Section	Submittal	Frequency	First Submittal Date
S3.A	Discharge Monitoring Report	Monthly	July 15, 2001
S3.F	Noncompliance Notification	As necessary	
S4.A	Operations and Maintenance Manual	Once	July 1, 2002
S4.B	Reporting Bypasses	As necessary	
S7.A	Acute Toxicity Characterization Data	Quarterly for one year	October, 2002
S7.C	Acute Toxicity Compliance Monitoring Reports	Conditional	
S7.D	Acute Toxicity: "Causes and Preventative Measures for Transient Events"	As necessary	
S7.D	Acute Toxicity TI/TRE Plan	As necessary	
S7.E	Acute Toxicity Effluent Characterization with Permit Renewal Application	2/permit cycle	November 1, 2004
S8.A	Chronic Toxicity Characterization Data	Quarterly for one year	October 1, 2002
S8.C	Chronic Toxicity Compliance Monitoring Reports	Conditional	
S8.D	Chronic Toxicity: "Causes and Preventative Measures for Transient Events."	As necessary	
S8.D	Chronic Toxicity TI/TRE Plan	As necessary	
S8.E	Chronic Toxicity Effluent Characterization with Permit Renewal Application	2/permit cycle	November 1, 2004
S9.A	Notification of Disinfection-type Decision	Once	December 1, 2004
S9.B	Submittal of Plans and Specifications for Disinfection System	Once	February 1, 2005
S9.C	Notification of Method(s) to Meet Temperature Limits	Once	December 1, 2004
S9.D	Submittal of Plans and Specifications to Meet Temperature Limits	Conditional	February 1, 2005
S9.E	Notification of Method(s) to Meet Dissolved Oxygen Limits	Once	December 1, 2004
S9.F	Submittal of Plans and Specifications to Meet Dissolved Oxygen Limits	Conditional	February 1, 2005

Permit Section	Submittal	Frequency	First Submittal Date
G1.	Notice of Change in Authorization	As necessary	

S1. DISCHARGE LIMITATIONS

A. Process Wastewater Discharges

All discharges and activities authorized by this permit shall be consistent with the terms and conditions of this permit.

The discharge of any of the following pollutants more frequently than, or at a level in excess of, that identified and authorized by this permit shall constitute a violation of the terms and conditions of this permit.

The discharge of any pollutant not specifically authorized by this permit in concentrations which violate receiving water quality standards established under section 307(a) of the Clean Water Act or Chapter 173-201A WAC, shall also be a violation of this permit and the Clean Water Act.

Beginning on the effective date of this permit and lasting through the expiration date, the Permittee is authorized to discharge treated combined vegetable processing wastewater at the permitted location subject to complying with the following limitations:

Average flow for the maximum month: 4.89 MGD
Instantaneous Peak flow: 7.00 MGD

Summer Season (April – October)

EFFLUENT LIMITATIONS: OUTFALL # 1		
Parameter	Average Monthly ^a	Maximum Daily ^b
BOD ₅ (mg/L) [lbs/day]	(51.1) [1705]	(95.2) [3176]
TSS (mg/L) [lbs/day]	(109) [3636] (109) [3636]	(218) [7272] (218) [7272]
Total Ammonia nitrogen ^c (mg/L) [lbs/day]	(1.19) [39.8]	(2.39) [79.8]
Fecal Coliforms ^d (#/100 mL)	*****	50/ 100 mL
Dissolved Oxygen ^d (mg/L)	Shall not be less than 8.0 mg/L or saturation ^e	
Temperature (°C) ^d	*****	22.5
PH pH	Not outside the range of 6.0 – 9.0 s.u	
Acute Toxicity	See Section S7.B	
Chronic Toxicity	See Section S8.B	

^a The average monthly effluent limitation is defined as the highest allowable average of daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

^b The maximum daily effluent limitation is defined as the highest allowable daily discharge. The daily discharge means the discharge of a pollutant measured during a calendar day. For pollutants with limitations expressed in units of mass, the daily discharge is calculated as the total mass of the pollutant discharged over the day. For other units of measurement, the daily discharge is the average measurement of the pollutant over the day.

^c Compliance shall begin April 1, 2002

^d Compliance shall begin September 1, 2005

^e Dissolved oxygen values less than 8 mg/L, but greater than the saturation concentration shall not be a permit violation.

Winter Season (November - March)

EFFLUENT LIMITATIONS: OUTFALL # 1		
Parameter	Average Monthly ^a	Maximum Daily ^b
BOD ₅ (mg/L) [lbs/day]	(65) [2168]	(130) [4337]
TSS (mg/L) [lbs/day]	(59) [1968] (59) [1968]	(118) [3936] (118) [3936]
Total Ammonia nitrogen ^c (mg/L) [lbs/day]	(1.45) [48.2]	(2.90) [96.7]
Fecal Coliforms ^d (#/100 mL)	*****	50/ 100 mL
Dissolved Oxygen (mg/L) ^d	Shall not be less than 8.0 mg/L or saturation ^e	
PH pH	Not outside the range of 6.0 – 9.0 s.u	
Acute Toxicity	See Section S7.B	
Chronic Toxicity	See Section S8.B	

^a The average monthly effluent limitation is defined as the highest allowable average of daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

^b The maximum daily effluent limitation is defined as the highest allowable daily discharge. The daily discharge means the discharge of a pollutant measured during a calendar day. For pollutants with limitations expressed in units of mass, the daily discharge is calculated as the total mass of the pollutant discharged over the day. For other units of measurement, the daily discharge is the average measurement of the pollutant over the day.

^c Compliance shall begin November 1, 2002

^d Compliance shall begin September 1, 2005

^e Dissolved oxygen values less than 8 mg/L, but greater than the saturation concentration shall not be a permit violation.

S2. MONITORING REQUIREMENTS

A. Monitoring Schedule

The sampling point for the Final Effluent shall be located downstream of the effluent flow meter and before the effluent leaves city property.

Category	Parameter	Units	Minimum Sampling Frequency	Sample Type
Wastewater – Influent	BOD ₅	lbs/day	1/ 2 weeks	24hr composite
	TKN	lbs/day	1/ 2 weeks	24hr composite
Wastewater – Final Effluent	Flow	MGD	continuous ¹	meter
	BOD ₅	mg/L, lbs/day	1/ week	grab
	TSS	mg/L, lbs/day	1/ week	grab
	Ammonia nitrogen	mg/L, lbs/day	1/ week	grab
	Fecal coliforms	#/ 100 mL	1/ week	grab
	Enterococcus	#/ 100 mL	1/ week ²	
	Dissolved Oxygen	mg/L; percent saturation	5/ week	grab
	pH	s.u.	5/ week	grab
	Temperature	°C	5/ week	grab

II. S9. COMPLIANCE SCHEDULE

- A. No later than December 1, 2004, the operator of the treatment facility (Earth Tech, Inc.) shall notify the Department, in writing, what form of disinfection will be installed at the industrial treatment facility that will result in the compliance with the fecal coliform limit in Section S1. (NOTE: Please see Response to Comments)
- B. No later than February 1, 2005, the operator of the treatment facility (Earth Tech, Inc.) shall submit to the Department for review and approval plans and specifications for the chosen method of disinfection for the industrial effluent. (NOTE: Please see Response to Comments)
- C. No later than December 1, 2004, the operator of the treatment facility (Earth Tech, Inc.) shall notify the Department, in writing, how the temperature limit in S.1 will be achieved. (NOTE: Please see Response to Comments)
- D. If changes or modifications to the treatment system are required to meet the temperature limit in S.1, then no later than February 1, 2005, the operator of the treatment facility (Earth Tech, Inc.) shall submit to the Department for review and approval plans and specifications for the changes to be made to comply with the temperature limit in Section S1. (NOTE: Please see Response to Comments)
- E. No later than December 1, 2004, the operator of the treatment facility (Earth Tech, Inc.) shall notify the Department, in writing, what changes or modifications to the operation or treatment system will be implemented at the industrial treatment facility that will result in compliance with the dissolved oxygen limits in Section S1. (NOTE: Please see Response to Comments)
- F. If changes or modifications to the treatment system are required to meet the dissolved oxygen limits in S.1, then no later than February 1, 2005, the operator of the treatment facility (Earth Tech, Inc.) shall submit to the Department for review and approval plans and specifications for the changes to be made to comply with the dissolved oxygen limits in Section S1. (NOTE: Please see Response to Comments)

Response to Comments

COMMENTS TO NPDES Permit No. WA-0021067

City of Quincy

RESPONSES

LAW OFFICES

Skellenger Bender

1301 FIFTH AVENUE, SUITE 300
SEATTLE, WASHINGTON 98101-2805
TEL (206) 447-1971
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NOV 18 2004

TERENCE J. SCANLAN
ts@skb.com

November 5, 2004

VIA FACSIMILE (509) 329-3570 AND REGULAR MAIL

Lenox Bramble, P.E.
Permit Unit Supervisor
Water Quality Section
Washington State Department of Ecology
4601 N. Monroe Street
Spokane, WA 99205-1295

Re: Draft NPDES Permit No. WA-002106-7

Dear Mr. Bramble:

I am writing on behalf of Earth Tech, Inc. with the following correction regarding the above referenced Draft NPDES Permit for the City of Quincy's Industrial Wastewater Treatment System.

The draft permit incorrectly identifies Earth Tech as a permit holder in conjunction with the City. While Earth Tech provides certain operation and maintenance services through the Service Agreement with the City of Quincy, Earth Tech is not the owner of the treatment facility, therefore, should not be identified as a permit holder. Further, Earth Tech's Service Agreement can be terminated for convenience by the City, hence, Earth Tech cannot be named as a permit holder since it could find itself at any point as having no control relating to the treatment plant. Accordingly, the draft NPDES permit should be revised to delete Earth Tech as a permit holder.

Earth Tech provides a fixed scope of operations services for the wastewater treatment facility but does not have full and complete management control of the Industrial Wastewater Treatment Plant. Earth Tech does not control sewer use or ordinances, setting of sewer rates, control of quantity or quality of industrial discharges or have responsibility of capital improvements. This management control has and remains the responsibility of the City of Quincy. Earth Tech's Service Agreement with the City of Quincy clearly defines that the City is responsible for all permits related to the operation of the facilities.

The Compliance Schedule section names the "operator of the treatment facility" (Earth Tech, Inc.) responsible for determining what changes or modifications will be implemented, as well as preparation of plans and specifications for the Department's review. This section should be revised to reflect that the owner, "City of Quincy" is responsible for meeting the compliance schedule. Earth Tech will continue to work and consult with the City regarding the design and

Comment: Delete Earth Tech as a permit holder.

Response: The Clean Water Act was adopted to "...restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Direct dischargers must comply with effluent limits in NPDES permits. Section 6.1 and 22.4 of the Service Agreement between Earth Tech and the City of Quincy states that Earth Tech has full management and control of the facilities, and shall exercise primary management and operational decision making authority over the facilities. Without listing Earth Tech on the permit Ecology does not have direct enforcement authority to require Earth Tech to make changes in the operations or management of the facility to comply with the discharge permit's effluent limits. In addition, the city does not have authority as per the Service Agreement to require Earth Tech to make changes to comply with permit conditions in response to enforcement actions from Ecology.

As the operator of the facility, Earth Tech must be authorized to discharge from the facility it operates to surface water. Being listed as the operator of the facility on the permit gives Earth Tech authorization to discharge and be in compliance with the Clean Water Act. NPDES regulations define "owner or operator" as the owner or operator of any facility or activity subject to regulation under the NPDES program; 40 CFR, Part 122.2.

Therefore, the inclusion of Earth Tech as the "Operator" on the cover page of the permit will remain.

Comment: Revise the Compliance Schedule to reflect that the owner, City of Quincy, is responsible for meeting the schedule.

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City of Quincy

RESPONSES

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operation of the treatment plant. However, Earth Tech has no control over (nor a current contractual requirement for) many of the elements of the compliance schedule.

Thank you for your attention to this matter. Please call me if I can be of any further assistance regarding this issue.

Very truly yours,

SKELLENGER BENDER, P.S.



Terence Scanlan

cc: Rick Wolf, Earth Tech
Dick Zimbelman, City of Quincy
Dan Fraizer, City of Quincy
Richard A. Smith, Smith & Lowney
Ron Lavigne, Office of the Attorney General
Bruce Loranger, US Bureau of Reclamation
Quincy-Columbia Irrigation District

Response: It is understood that the city of Quincy has ownership of the treatment facility and that the city does not have primary control over the operation of the facility and can not directly make changes to the facility. It is also recognized that Earth Tech designed and built the current treatment facility and is most familiar with its operation. Language in the Service Agreement shows that Earth Tech shall provide such engineering and technical services required to ensure the proper operation and maintenance of the facilities (Section 6.1.8), and that Earth Tech will operate the facility in compliance with applicable law and will comply state and federal agencies having jurisdiction over the facility (Section 6.1.15).

As noted previously the owner and operator are subject to regulation under the NPDES program, and both have an obligation to comply with permit conditions. Therefore, the wording in the Compliance Schedule will be changed to show that both the owner and operator will be responsible for the required submittals.

The following changes will be made in the Compliance Schedule:

S9.A will read: No later than December 1, 2004, the operator (Earth Tech, Inc.) **and owner (the City of Quincy)** of the treatment facility shall notify the Department, in writing, what form of disinfection will be installed at the industrial treatment facility that will result in the compliance with the fecal coliform limit in Section S1.

S9.B will read: No later than February 1, 2005, the operator (Earth Tech, Inc.) **and owner (the City of Quincy)** of the treatment facility shall submit to the Department for review and approval plans and specifications for the chosen method of disinfection for the industrial effluent.

RESPONSES

COMMENTS TO NPDES Permit No. WA-0021067
City of Quincy

S9.C will read: No later than December 1, 2004, the operator (Earth Tech, Inc.) and owner (**the City of Quincy**) of the treatment facility shall notify the Department, in writing, how the temperature limit in S.1 will be achieved.

S9.D will read: If changes or modifications to the treatment system are required to meet the temperature limit in S.1, then no later than February 1, 2005, the operator (Earth Tech, Inc.) and owner (**the City of Quincy**) of the treatment facility shall submit to the Department for review and approval plans and specifications for the changes to be made to comply with the temperature limit in Section S1.

S9.E will read: No later than December 1, 2004, the operator (Earth Tech, Inc.) and owner (**the City of Quincy**) of the treatment facility shall notify the Department, in writing, what changes or modifications to the operation or treatment system will be implemented at the industrial treatment facility that will result in compliance with the dissolved oxygen limits in Section S1.

S9.F will read: If changes or modifications to the treatment system are required to meet the dissolved oxygen limits in S.1, then no later than February 1, 2005, the operator (Earth Tech, Inc.) and owner (**the City of Quincy**) of the treatment facility shall submit to the Department for review and approval plans and specifications for the changes to be made to comply with the dissolved oxygen limits in Section S1.

